

Exhibit 16

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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NATASHA SEVERIN and GALINA
COTOVA, individually and on Behalf of
all others similarly situated,

No. 10 Civ. 9696(DLC)

Plaintiffs,

DECLARATION

- against -

PROJECT OHR, INC., METROPOLITAN
COUNCIL ON JEWISH POVERTY, and
D'VORAH KOHN,

Defendants.

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I, Elizabeth Vladimirov, pursuant to 28 U.S.C. §1746, declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct:

1. My mother receives sleep-in care from a Project OHR home attendant 7 days a week. Project OHR offers a great service because I know that someone is always taking care of my mom, keeping her safe, well-fed and clean, while I am working or taking care of my family.

2. My mom lives in a one bedroom apartment. There is a couch in the living room where my mom sits and loves to spend most of her time watching TV. There is also a table in the living room area with a vase of flowers.

3. My mom is generally awake from 8am to 7pm. The home attendant cares for her during that time. After that my mother goes to sleep for the night. My mother generally has no trouble sleeping through the night.

4. The home attendants that care for my mom wash dishes, clean any water off the floor after my mom's morning bath, or sweep around the couch when she eats there. They each do some limited general cleaning once a week. They will dust the TV, clean the table where the flowers are, and sweep the bedroom and living room floors. This takes no more than 20 minute to a half hour to do each day. I know this because I have seen the home care attendants do this cleaning and because I do it myself sometimes. It's really not a big deal because my mom doesn't do much all day, so the apartment doesn't get messy.

5. My brother does the harder cleaning, or we hire a housekeeper to do it. My brother or the housekeeper we hire will wash windows, clean in the cracks, underneath furniture, and that type of cleaning. We have never asked a home attendant to do this type of cleaning.

6. Since my mother has dementia, she would have great difficulty discussing what I have just said. If her condition was better, I know that she would say the same things.

Dated: November 23, 2011
New York, New York

By: E. Vladimirov
Elizabeth Vladimirov

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